

LAW OFFICES OF
DEKIEFFER & HORGAN
SUITE 800
729 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE
(202) 783-6900

Affiliated Office:
SAARBRÜCKEN, GERMANY

FACSIMILE
(202) 783-6909

November 13, 2001

By E-Mail

Gloria Blue, Executive Secretary
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

PUBLIC DOCUMENT

Re: Steel, Investigation No. TA-201-73; Exclusion Requests

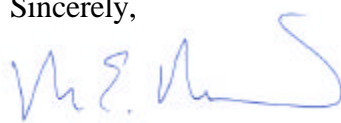
Dear Ms. Blue:

Pursuant to the notice of request for comments published at 66 Fed. Reg. 54321 (Oct. 26, 2001), we hereby submit the enclosed exclusion requests for the following products on behalf of voestalpine Grobblech GmbH:

- | | |
|----------------|--|
| 1. ALFORM® 700 | 4. ALTRIX® |
| 2. ALFORM® 900 | 5. Clad Plate |
| 3. ALFORM® 960 | 6. Tin Nickel Clad Plate for Power Plant
Chimneys and Absorbers |

If you have any questions, please do not hesitate to contact us by telephone or by e-mail at montalbine@dhlaw.de.

Sincerely,



J. Kevin Horgan
Donald E. deKieffer
Marc E. Montalbine

Attachments

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion request voestalpine Grobblech

(a) + (b) Name for the product (HTS number), Description of the product

ALFORM 700 (100,000psi) Thermomechanically Rolled High Strength Low Alloy Discrete/Heavy Plates

U.S.TARIFF's: 7225.40.30.50 Hot Rolled Other Alloy, not in coils with a thickness of 4.75mm or more

(c) Basis for Exclusion Request

Limited supply because of no U.S. suppliers.

(d) U.S. Producers

No U.S. Producer

Producers have been listed based on the experience of the Customer and the Mill.

Foreign Producers in addition to voestalpine STAHL

Thyssen/Krupp, Germany

Producers have been listed based on the experience of the Customer and the Mill.

(e) Estimates Consumption 1996-2000

1996	0mt	\$0
1997	0mt	\$0
1998	0mt	\$0
1999	0mt	\$0
2000	1,5000mt	\$900,000

Estimates have been made based on the experience of the Customer and the Mill..

Estimates Consumption 2001-2005

2001	2,5000mt	\$1,500,000
2002	3,500mt	\$2,100,000
2003	4,500mt	\$2,700,000
2004	5,500mt	\$3,300,000
2005	6,500mt	\$3,900,000

Estimates have been made based on the experience of the Customer and the Mill.

(f) U.S. Production 1996-2000

1996	0mt
1997	0mt
1998	0mt
1999	0mt
2000	0mt

Estimates have been made based on the experience of the Customer and the Mill.

(g) Availability of Substitute Products

According to the customer there is no substitute with the same surface, forming and welding properties.

A 514 would meet the yield strength requirements but since it is produced as Quenched and Tempered the A514 has less forming and welding ability and a lower surface quality.

U.S. A 514 Producers are Oregon Steel, Portland, OR; U.S. Steel, Gary, IN; Bethlehem Steel in Burns Harbor, IN, in Coatesville, PA and in Conshohocken, PA.

The yearly U.S. A 514 Production in 1996 - 2000 was bw. 180,000 and 220,000mt.

US-Customers for this product - Contacts:

STEELWAREHOUSE CO., INC.
PO BOX 1377
SOUTH BEND, IN 46624
CONTACT: VP - GORDON AUBUCHON
219.236.5100
gordona@steelwarehouse.net

LEECO STEEL PRODUCTS, INC.
8255 SOUTH LEMONT ROAD SUITE 100
DARIEN, IL. 60561
CONTACT VP -DENTON NORDHUES
630.427.2190
dnordhues@leecosteel.com

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion request voestalpine Grobblech

(a) + (b) Name for the product (HTS number), Description of the product

ALFORM 900 (130,000psi) Thermomechanically Rolled High Strength Low Alloy Discrete/Heavy Plates
(U.S.TARIFF's: 7225.40.30.50 Hot Rolled Other Alloy, not in coils with a thickness of 4.75mm or more)

(c) Basis for Exclusion Request

Limited supply because of no U.S. suppliers.

(d) U.S. Producers

No U.S. Producer

Producers have been listed based on the experience of the Customer and the Mill.

Foreign Producers in addition to voestalpine STAHL

Thyssen/Krupp, Germany

Producers have been listed based on the experience of the Customer and the Mill.

(e) Estimates Consumption 1996-2000

1996	0mt	\$0
1997	0mt	\$0
1998	0mt	\$0
1999	0mt	\$0
2000	0mt	\$0

Estimates have been made based on the experience of the Customer and the Mill..

Estimates Consumption 2001-2005

2001	0mt	\$0
2002	1,000mt	\$730,000
2003	2,000mt	\$1,460,000
2004	3,000mt	\$2,190,000
2005	4,000mt	\$2,920,000

Estimates have been made based on the experience of the Customer and the Mill.

(f) U.S. Production 1996-2000

1996	0mt
1997	0mt
1998	0mt
1999	0mt
2000	0mt

Estimates have been made based on the experience of the Customer and the Mill.

(g) Availability of Substitute Products

According to the customer there is no substitute with the same surface, forming and welding properties.

A Substitution Product (no Standard) which meets the yield strength requirements is available but since it is produced as Quenched and Tempered it has less forming and welding ability and a lower surface quality.

The Substitution Product Producers are Oregon Steel, Portland, OR; U.S. Steel, Gary, IN; Bethlehem Steel in Burns Harbor, IN, in Coatesville, PA and in Conshohocken, PA.

The yearly U.S. production in 1996 - 2000 was bw. 15,000 and 20,000mt

US-Customers for this product - Contacts:

STEELWAREHOUSE CO., INC.
PO BOX 1377
SOUTH BEND, IN 46624
CONTACT: VP - GORDON AUBUCHON
219.236.5100
gordona@steelwarehouse.net

LEECO STEEL PRODUCTS, INC.
8255 SOUTH LEMONT ROAD SUITE 100
DARIEN, IL. 60561
CONTACT VP -DENTON NORDHUES
630.427.2190
dnordhues@leecosteel.com

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion request voestalpine Grobblech

(a) + (b) Name for the product (HTS number), Description of the product

ALFORM 960 (140,000psi) Thermomechanically Rolled High Strength Low Alloy Discrete/Heavy Plates
(U.S.TARIFF's: 7225.40.30.50 Hot Rolled Other Alloy, not in coils with a thickness of 4.75mm or more)

(c) Basis for Exclusion Request

Limited supply because of no U.S. suppliers.

(d) U.S. Producers

No U.S. Producer

Producers have been listed based on the experience of the Customer and the Mill.

Foreign Producers in addition to voestalpine STAHL

Thyssen/Krupp, Germany

Producers have been listed based on the experience of the Customer and the Mill.

(e) Estimates Consumption 1996-2000

1996	0mt	\$0
1997	0mt	\$0
1998	0mt	\$0
1999	0mt	\$0
2000	0mt	\$0

Estimates have been made based on the experience of the Customer and the Mill..

Estimates Consumption 2001-2005

2001	0mt	\$0
2002	1,000mt	\$730,000
2003	2,000mt	\$1,460,000
2004	3,000mt	\$2,190,000
2005	4,000mt	\$2,920,000

Estimates have been made based on the experience of the Customer and the Mill.

(f) U.S. Production 1996-2000

1996	0mt
1997	0mt
1998	0mt
1999	0mt
2000	0mt

Estimates have been made based on the experience of the Customer and the Mill.

(g) Availability of Substitute Products

According to the customer there is no substitute with the same surface, forming and welding properties.

A Substitution Product (no Standard) which meets the yield strength requirements is available but since it is produced as Quenched and Tempered it has less forming and welding ability and a lower surface quality.

The Substitution Product Producers are Oregon Steel, Portland, OR; U.S. Steel, Gary, IN; Bethlehem Steel in Burns Harbor, IN, in Coatesville, PA and in Conshohocken, PA.

The yearly U.S. production in 1996 - 2000 was bw. 15,000 and 20,000mt

US-Customers for this product - Contacts:

STEELWAREHOUSE CO., INC.

PO BOX 1377

SOUTH BEND, IN 46624

CONTACT: VP - GORDON AUBUCHON

219.236.5100

gordona@steelwarehouse.net

LEECO STEEL PRODUCTS, INC.

8255 SOUTH LEMONT ROAD SUITE 100

DARIEN, IL. 60561

CONTACT VP -DENTON NORDHUES

630.427.2123

dnordhues@leecosteel.com

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion request voestalpine Grobblech

(a) + (b) Name for the product (HTS number), Description of the product

ALTRIX - Three layer clad plates

U.S. TARIFF's:

7210.90.10.00 Clad of a width of 600mm or more

7212.60.00.00 Clad of a width of less than 600mm

+ see attachments

(c) Basis for Exclusion Request

No supply because of no U.S. suppliers.

(d) U.S. Producers

No U.S. Producer

Foreign Producers in addition to voestalpine Grobblech

No producer worldwide.

(e) Estimates Consumption 1996-2000

about 100-150 t per year

(f) Estimates Production 1996-2000

No production in the USA.

(g) Availability of Substitute Products

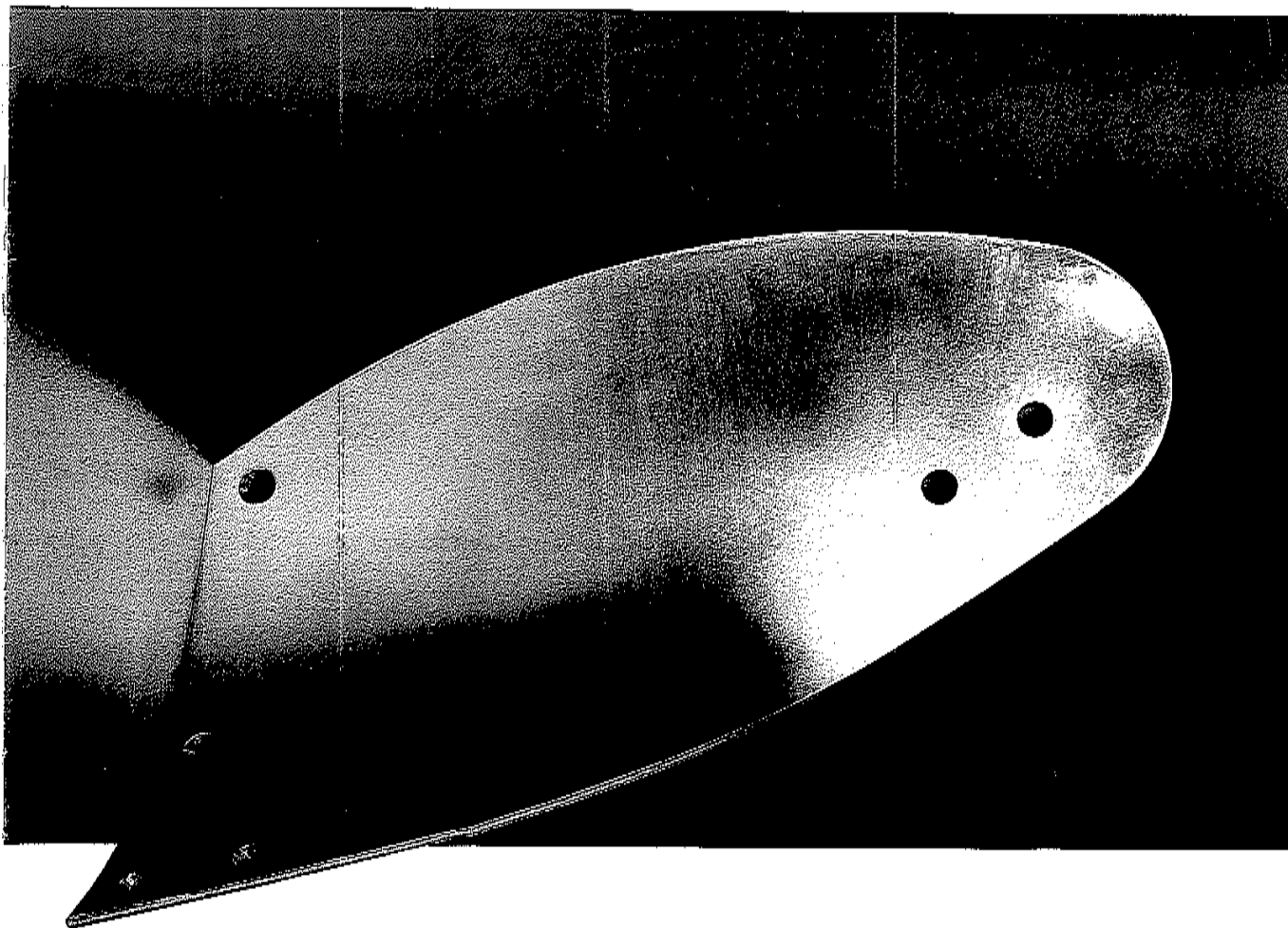
No substitute available.

US-Customers for this product - Contacts:

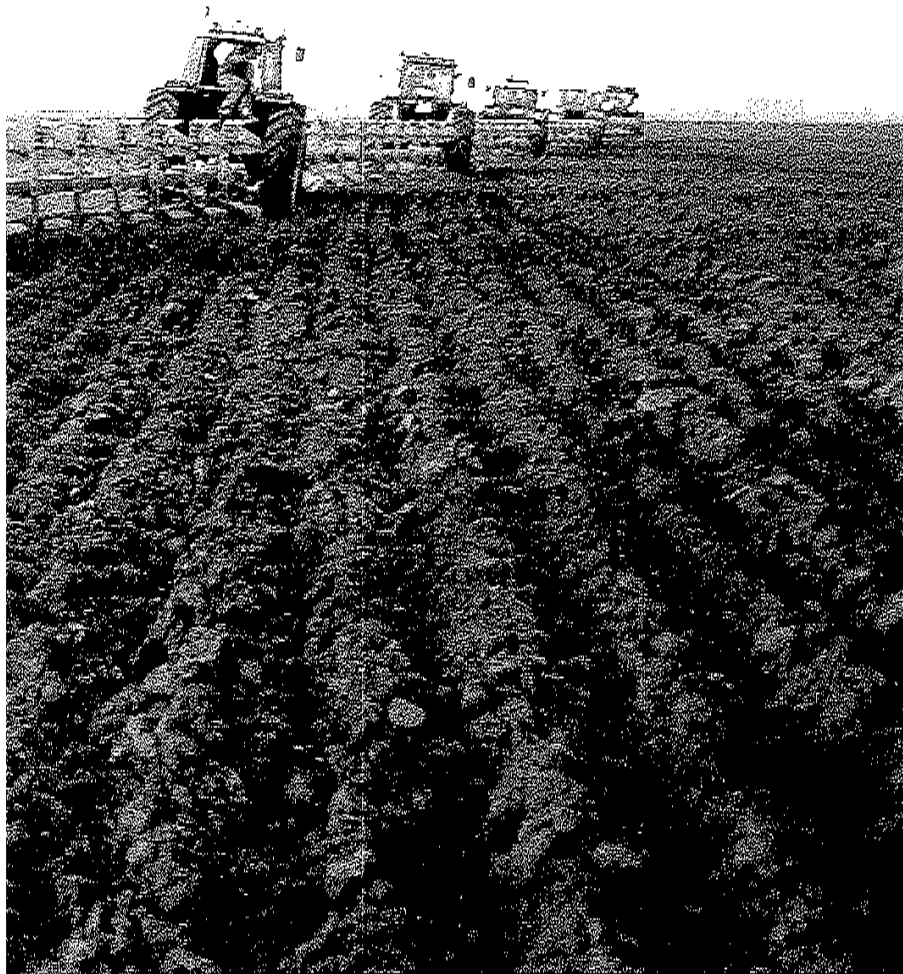
STAR MANUFACTURING COMP.
1801 S. IHM BLVD.
FREEPORT, IL. 61032
CONTACT: PURCHASE - KIM HAMMOND
815.235.7750
khammond@starmsg.com

ALTRIX®

THE THREE-LAYER PLATES FOR MOULD
BOARDS WITH OUTSTANDING HARDNESS AND ELASTICITY



THAT'S THE CREAM OF THE CROP



DELIVERY PROGRAMME

- Clad plates.
- Strips.
- Profiled plates.

AVAILABLE DIMENSIONS

■ Plates

Length: max. 8000 mm

Width: max. 1400 mm

Thickness: 4 to 10 mm

■ Strips

Length: max. 8000 mm

Width: max. 100 mm

Thickness: 4 to 10 mm

■ Mould boards

(Any desired shape)

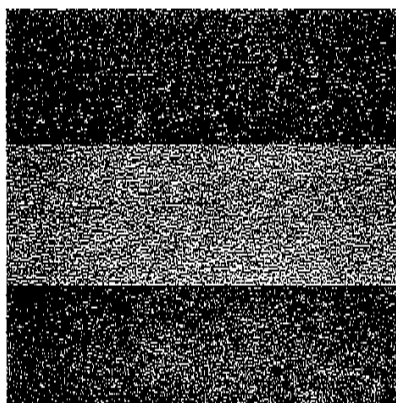
Thickness: 4 to 10 mm

DELIVERY CONDITION

Rolled and, if required, normalized and pickled.

LAYER DISTRIBUTION

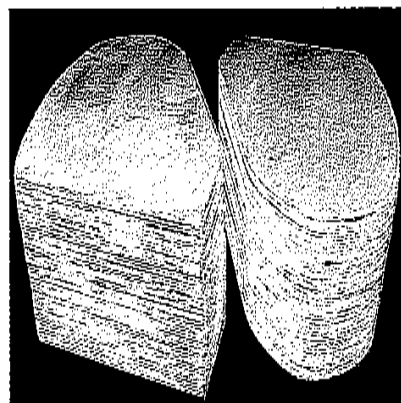
Three-ply plates can be supplied with either a symmetrical or asymmetrical layer distribution. The desired layer distribution must be agreed upon at the time of ordering.



ALTRIX® macrostructure

LAYER DISTRIBUTION
in % of the overall thickness

e.g. symmetric 33-33-33	asymmetric 20-40-40
----------------------------	------------------------



Profiled plates

ALTRIX® THREE-LAYER PLATES -



THE SERVICE LIFE OF A PLOUGH IS LARGELY
DEPENDENT ON THE PLOUGH BOARDS.
THE TOUGHER THIS WEAR COMPONENT IS,
THE BETTER AND MORE ECONOMIC THE
PLOUGH. QUITE SIMPLY, HARDNESS MEANS
QUALITY AND THE FARMER REAPS THE
BENEFITS.

For a number of years, VOEST-ALPINE Stahl Linz has been manufacturing a three-ply steel that has achieved an excellent reputation not just in the agricultural machinery sector, but also generally. ALTRIX® is a byword for maximum wear resistance under extreme conditions. The ALTRIX® range comprises special steels, which consist of an inseparable rolled cladding bond between two hard outer layers and an elastic middle layer. This composite guarantees the fulfillment of the widest range of demands with regard to maximum hardness and elasticity.

ALTRIX® is both hard and tough. The result is that ALTRIX® products are characterized by enormous wear-

resistance. The 64-66 Rockwell C level of hardness achieved across the entire thickness of the outer layer ensures an above-average service life for plough boards.

RELIABLE IN EVERY WAY

VOEST-ALPINE Stahl Linz has long-term proven know-how in the clad plate sector, which guarantees that ALTRIX® possesses a uniformly high standard of quality.

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion request voestalpine Grobblech

(a) Name for the product (HTS number)

Other Clad Plates

U.S. TARIFF's:

7210.90.10.00 Clad of a width of 600mm or more

7212.60.00.00 Clad of a width of less than 600mm

(b) Description of the product

These products are typically used in construction of equipment for chemical process plants.

(c) Basis for Exclusion Request

There is only one domestic manufacturer of rollbond clad plates with size capabilities similar to Voest, Bethlehem Lukens Steel. There is a second domestic producer with very limited capability, Ametek Corp. The only non-US and non-European manufacturers are in Japan. All Japanese clad is covered by a Dumping suit that has been in place since 1996.

(d) U.S. Producers

Bethlehem Lukens Steel

Ametek Corp.

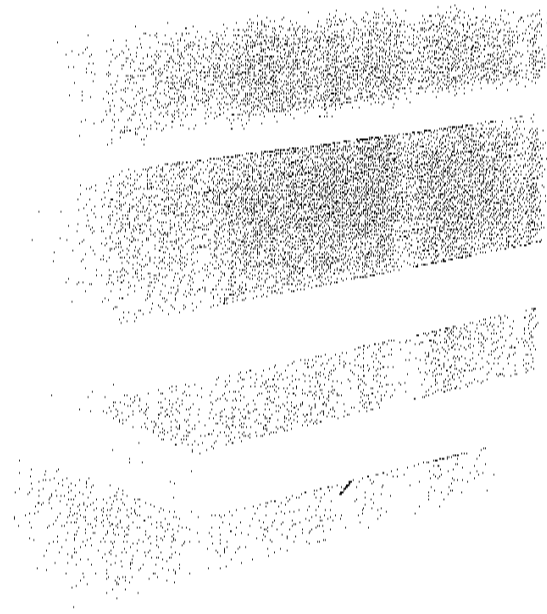
(g) Availability of Substitute Products

Restriction of Voest clad plates would leave the domestic US customers with only one source of supply.

US-Customers for this product - Contacts:

Dow Chemical, Houston, TX
ED Garza, 713-978-2384

Ohmstede, Beaumont, TX
Preston Fenn, 281-471-4140
Mike Hamersly. President, 409-833-6375



DIVERSIFICATION

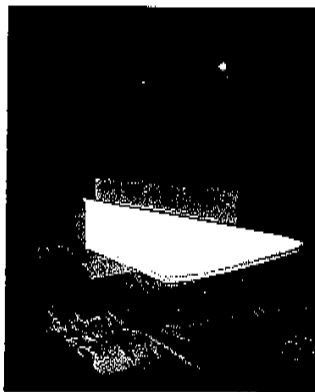
The range of applications for rolled clad plates is characterised by great diversity and sophistication. The high quality of our products meets today's most demanding requirements. The materials can withstand the toughest requirements with regard to operational and processing characteristics, i.e. corrosion resistance and wear.

VOESI-ALPINE STAHL LINZ rolled clad plates, which are manufactured in a company-developed process, represent an economic alternative to expensive, high alloy solid plate

and other substitutes (i.e. rubber coatings, plastics, etc.).

ADVANTAGES OVER ALLOY STEEL PLATE

- The ideal combination of the mechanical characteristics of the base metal with the corrosion resistance of the cladding.
- A resulting reduction in both wall thickness and weight as compared with solid plate.

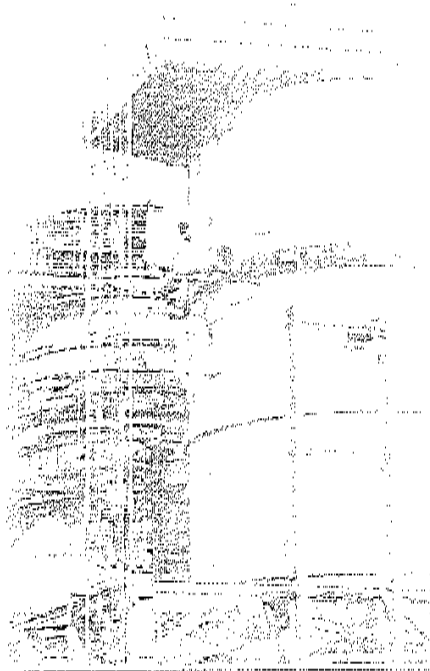


- Shorter weld lengths, as larger dimensions can be supplied than with solid plate.
- Lower welding filler costs.
- The possibility of using proven welding techniques.
- Superior heat conductivity to that of fully austenitic plates.
- Reduced material costs.

ADVANTAGES OVER OTHER SUBSTITUTES

i.e. rubber coatings, plastics, etc.

- Far longer service life.
- Considerably less maintenance.
- Simpler repairs and therefore fewer operational standstills.
- Rolled clad plates can be recycled.

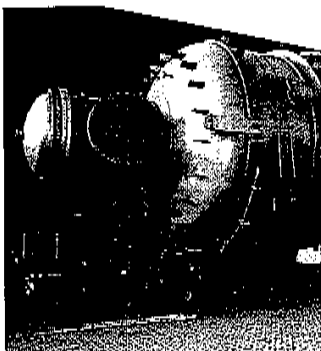


BRANCHES AND PRODUCT RANGE

*Rolled clad plates have a
wealth of applications.*

As developments in recent years have demonstrated, clad plates have found a multifarious and growing range of applications.

This development is not only due to their economic advantages, but also to the technical superiority of this product over other materials.



PETROCHEMICAL INDUSTRY

i.e.

- Columns
- Reactors
- Crackers
- Cokers

ENVIRONMENTAL ENGINEERING

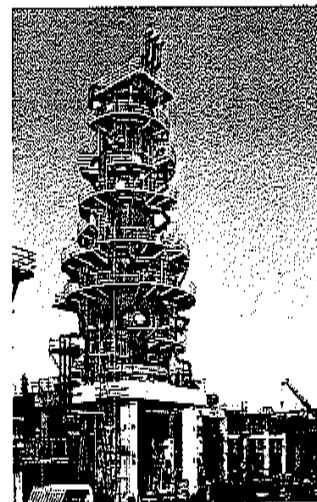
i.e.

- Flue gas desulphurization plants
- Sewage plants
- Absorbers
- Scrubbers
- Flues
- Flue gas ducts
- Waste incineration plants

OFFSHORE – SOUR GAS

i.e.

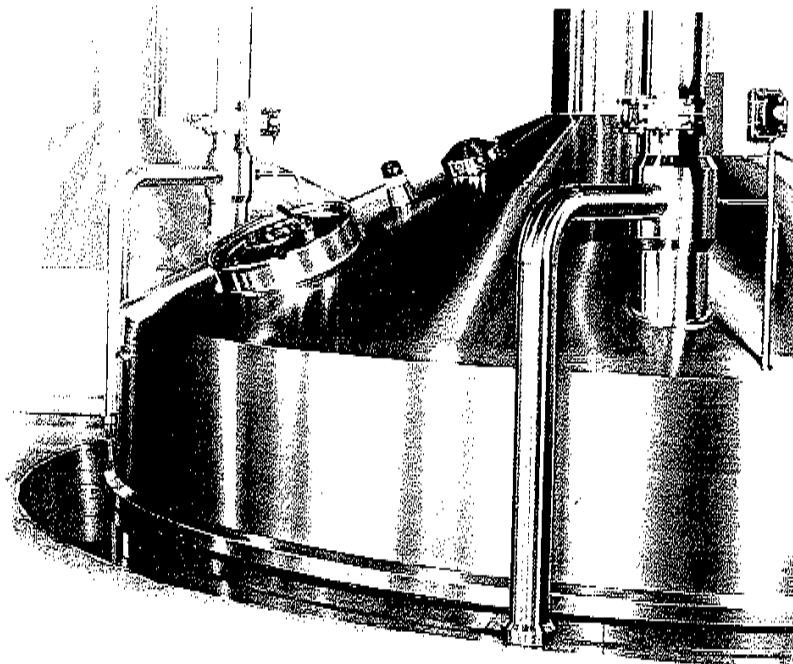
- Separators
- Absorbers
- Piping systems



CHEMICAL INDUSTRY

i.e.

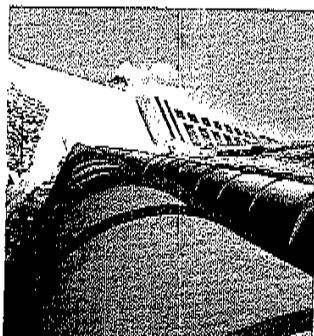
- Columns
- Reactors
- Autoclaves
- Mixing vessels
- Pipes
- Gas scrubbers
- Heat exchangers
- Melting vessels
- Storage containers
- Rotary kilns



FOODSTUFFS INDUSTRY

i.e.

- Mash coppers for breweries
- Canteen equipment (tilting-type
frying pans, oven hot plates)
- Thin layer evaporators
- Filling plants



DESALINATION PLANTS

i.e.

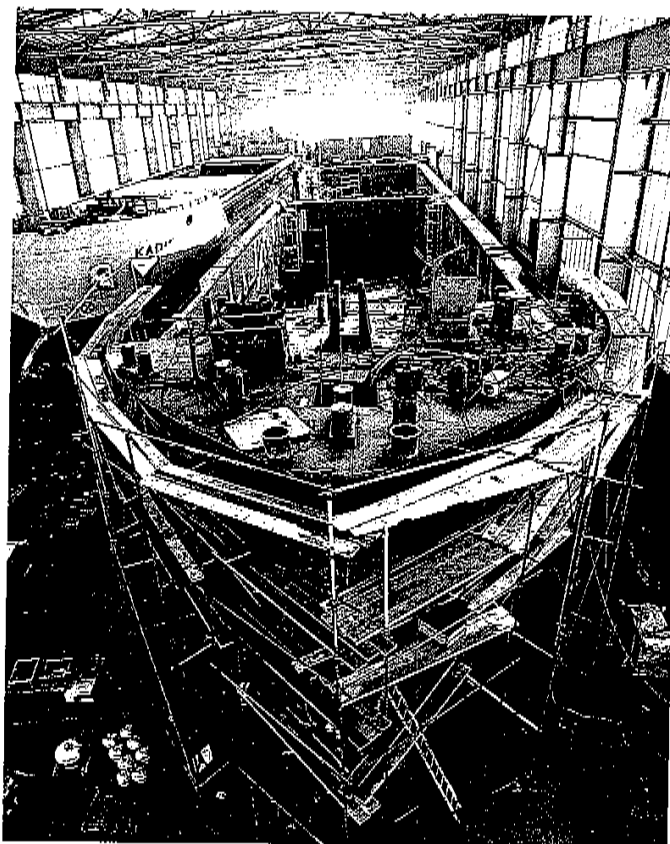
- Piping systems
- Heat exchangers
- Evaporators
- Valve chambers

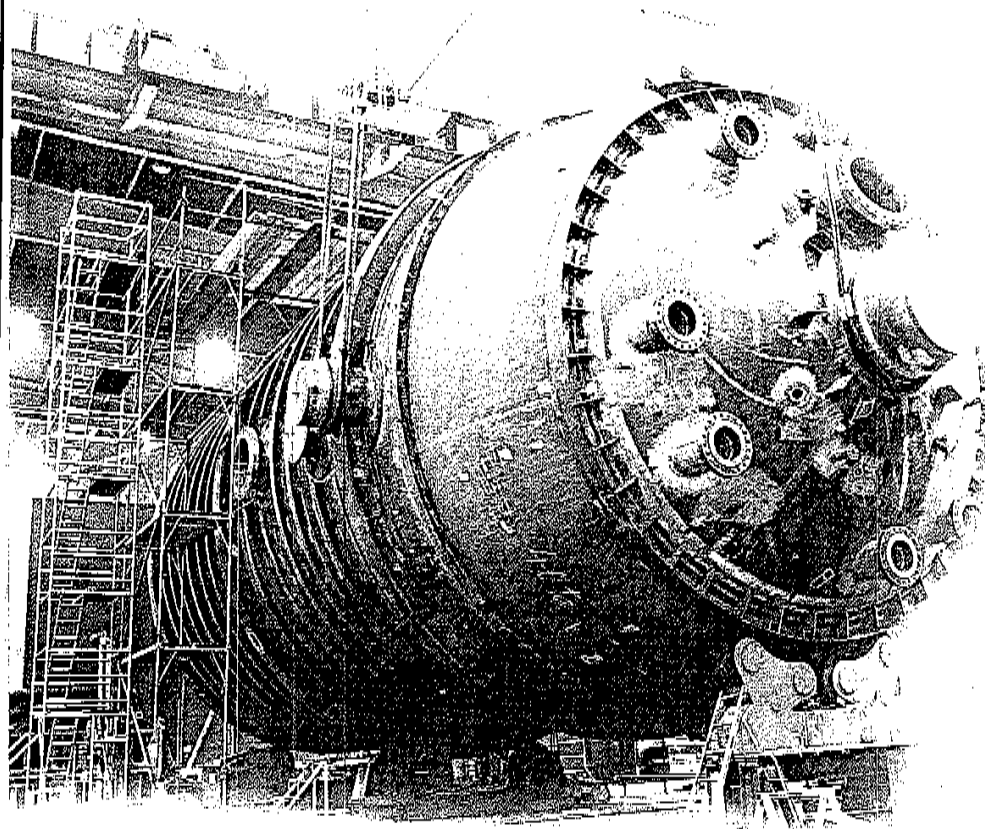
SPECIAL SHIPBUILDING

i.e.

- Chemical tankers
- Outer hulls for ice-breakers

- Non-fouling outer hulls for
warm water shipping
- Heat exchangers for ship
refrigeration plants





POWER STATIONS

i.e.

- Condensers
- Heat exchangers
- Separators
- Tube plates
- Pressure reservoirs
- High pressure preheaters

- Accumulators
- Collecting basins
- Dryers
- Generators

HYDROELECTRIC POWER STATIONS

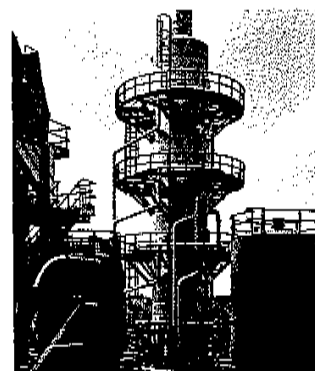
i.e.

- Gate valves
- Ducts
- Penstocks
- Weirs

PULP AND PAPER MILLS

i.e.

- Cellulose cookers

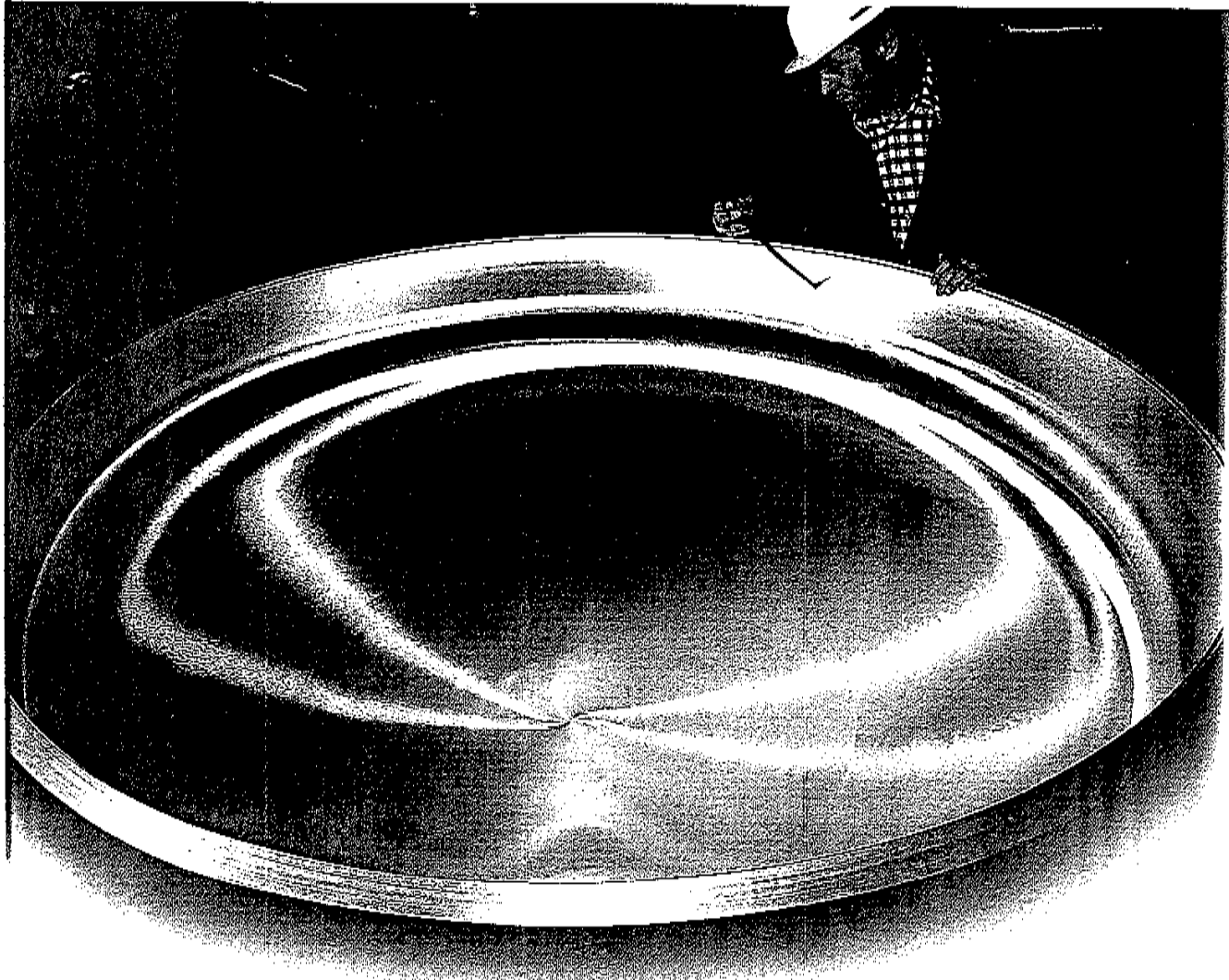


- Evaporator tube plates
- Bleaching plants

OTHER APPLICATIONS

i.e.

- Hardening vessels
- Melting vessels
- EAF busbars



Clad dished heads and shell plates from a single source. The best solution for steel apparatus construction.

WE MANUFACTURE

- All standard dished heads.
- Heads in accordance with all national standards and specifications.
- In all material combinations.
- Torospherical, semi-elliptical and elliptical heads with diameters from 250 – 7.000 mm in one piece, from approx. 3.200 mm with one weld seam.

- Semi-spherical heads with diameters of 2.500 mm in one piece, larger semi-spherical heads with crown and pedals.
- Wall thickness* of max. 160 mm for diameters up to 3.600 mm, max. 55 mm for larger heads, both on the finished head.

WE OFFER

- Any required weld preparation.
- Any heat treatment in accordance with the requirements of the material, including water quenching for

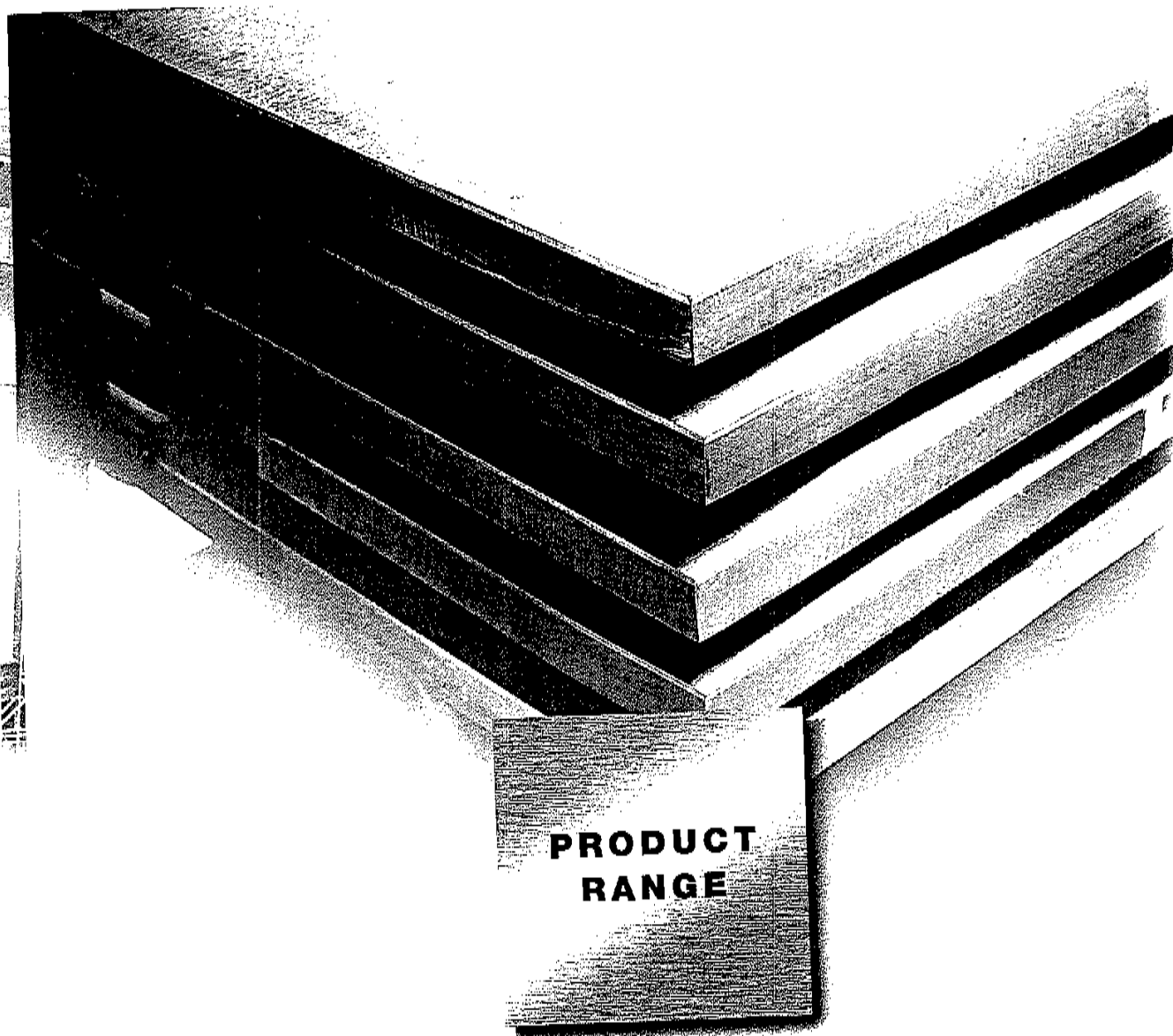
up to 6.000 mm diameter.

- Surface treatments including grinding to grain 360, glass bead blasting, pickling.
- All destructive and non-destructive material tests.
- Special variations on request.

The quality monitoring and assurance for plates and heads is in the hands of one quality assurance department.

Please direct any inquiries to our plate pressing department.

FAX 0043/732/6980-8059



PRODUCT RANGE

DELIVERY VARIATIONS

- Plates
- Edge machined plates
- Double-sided clad plates
- Discs
- Single- and multi-piece heads
- Flat heads
- Flat-dished heads
- Torospherical heads
- Semi elliptical heads

• Elliptical heads

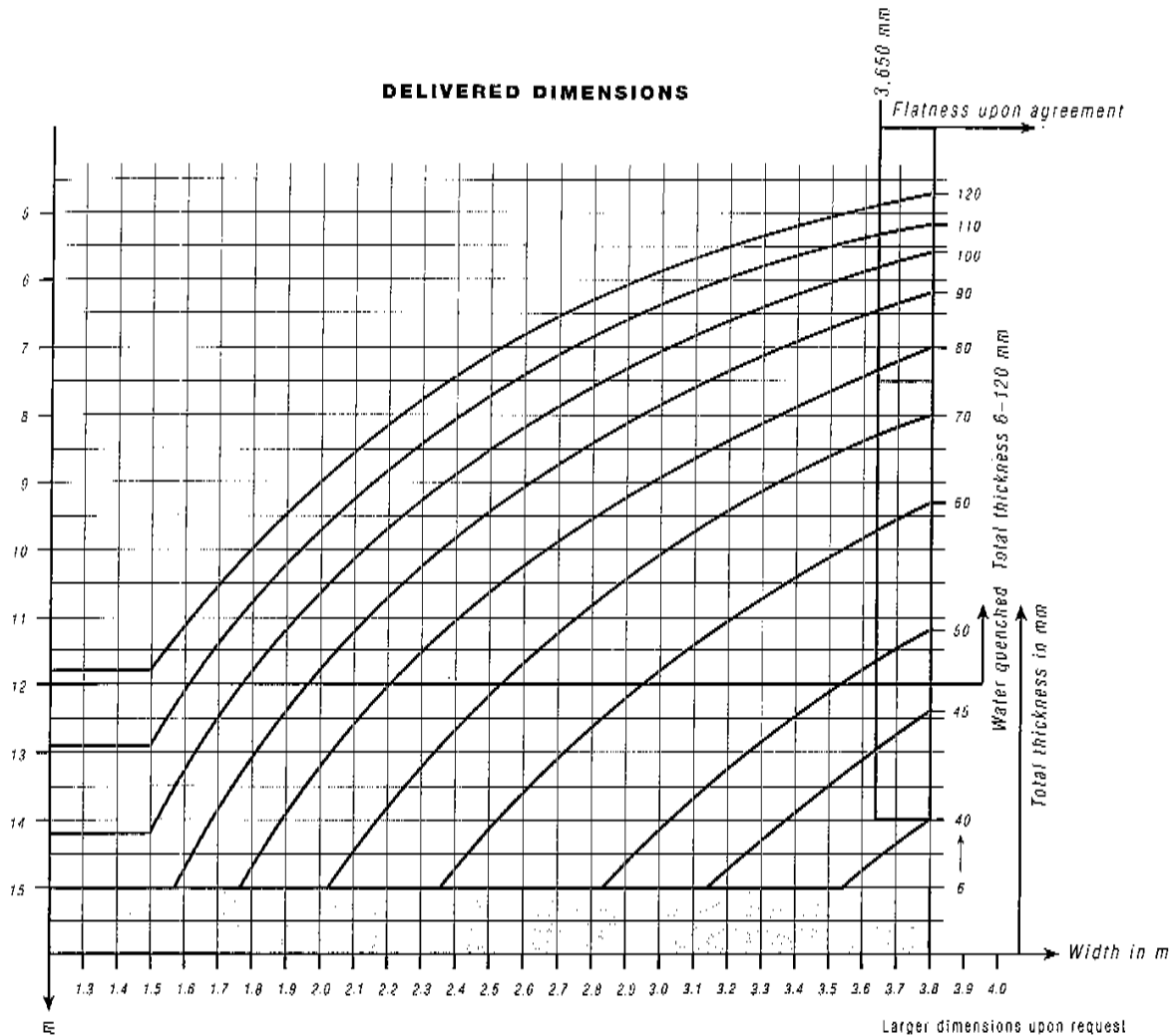
• Semi-spherical heads

We are highly flexible and respond to individual customer requirements.

The manufacture, testing and delivery of the clad plates, blanks and pressings takes place in accordance with all national and international standards, or special customer specifications.

Examples of standard delivery regulations for rolled clad plates include:

- AD-Merkblatt W 8
- SFL 075
- ASTM A 263, 264, 265
- ASTM B 432
- NF A 36-250
- SS 219130
- GOST 10885
- JIS G 3601, G 3602, G 3603, G 3604

**Rolled clad plates with austenitic or ferritic cladding**

Max. workpiece weight: 17,000 kg, water quenching up to max. 12,000 mm length.

Rolled clad plates with Nickel or Copper based alloy cladding

Max. workpiece weight: 12,000 kg, total thickness: 6-60 mm, max. width: 3,800 mm, max. length: 15,000 mm, water quenching up to max. 12,000 mm length.

Rolled clad plates with Titanium cladding

Max. workpiece weight: 3,000 kg, total thickness: 6-25 mm, max. width: 3,000 mm, max. length: 12,000 mm.

CLADDING**SURFACES**

The surface of the cladding is generally ground with grain 60.

A different grinding grain must be agreed upon ordering. Alternative surfaces can be supplied as requested.

If additional cladding surface treatment is planned (i.e. fine grinding, polishing), this must be stated in the inquiry.

Standard values for roughness depth (R_z) and mean roughness value (R_a) in μm :

Grain	60	80	100	120	150	180	220	240	280	320	360
R_z	22	18	14	11	9	6	4	2.5	1.8	1.3	1.2
R_a	3.8	2.6	2.0	1.7	1.4	1.2	0.9	0.8	0.6	0.45	0.4

voestalpine Eurostahl
Internationale Wirtschaftsbeziehungen
IW/OC/Zm
Linz, 2001-11-08

Exclusion requests voestalpine Grobblech

(a) Name for the product (HTS number)

Thin Nickel Alloy Clad Plates for Power Plant Chimneys and Absorbers

U.S. TARIFF's:

7210.90.10.00 Clad of a width of 600mm or more

7212.60.00.00 Clad of a width of less than 600mm

(b) + (c) Description of the product + Basis for Exclusion Request

This specific product has a very specific application in coal fired electric power generation plants. None of the domestic clad manufacturers offer plates of the thicknesses preferred for these plants or in the sizes needed for low cost chimney construction. If Voest clad plates are restricted, there is no domestic option.

(d) U.S. Producers

No U.S. Producer

(f) Estimates Production 1996-2000

No production in the USA

(g) Availability of Substitute Products

Also, none of the domestic manufacturers offer come of the nickel alloys which are preferred by the power companies. There is no "like kind" product to what Voest produces manufactured in the USA. The customers are the chimney builders and the power companies.

US-Customers for this product - Contacts:

ZBD Constructors, Tampa, FL, Chimney Builder
John Stewart, 813-342-4950

Pullman Power, Kansas City, Chimney Builder
Jim Naylor, 816-920-2515

Warren Engineering, Atlanta, Chimney Engineering Co.
Ray Warren, 404-843-8333

Arizona Public Service, Phoenix, AZ
Lee Dzygryniuk, 602-371-6290